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3	Associate General Counsel Office of Program Litigation, Office 7	
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9		DISTRICT COURT
10	EASTERN DISTRICT OF CALIFORNIA	
11	KRISTEN HANCOCK,	Case No. 2:24-CV-03425-DC-CKD
12	Plaintiff,	STIPULATION AND ORDER FOR AN EXTENSION OF TIME
13	Vs.	EXTENSION OF TIME
14	\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \	
15	COMMISSIONER OF SOCIAL SECURITY,	
16	Defendant.	
17	Detendant.	
18	Danding the Court's approval IT IS HEI	DEDV STIDLIL ATED by and between the parties
19	Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties	
20	through their respective counsel of record, that the time for Defendant to respond to Plaintiff's Motion for Summary Judgment be extended from May 23, 2025, up to and including June 20,	
21		
22		s Scheduling Order shall be modified accordingly.
23	This is the Defendant's second request for an extension. Since the last extension request	
24	Defendant has identified a possibility for settlement of this matter and respectfully requests this	
25	extension to allow sufficient time to internally discuss, and if required, negotiate with Plaintiff's	
26	counsel. Counsel has been diligent in her work, and in the last four weeks, has completed two	
27	responsive briefs. Defendant's counsel also recently contracted COVID-19 which limited her	
28	productivity. In addition to this case, counsel h	nas seven upcoming responsive briefs in the next
	1	

1	four weeks, including a Circuit brief.	
2		
3	Respectfully submitted,	
4	Dated: May 22, 2025 By: /s/ Christopher J. Reichman*	
5	(*as authorized via e-mail on May 22, 2025) CHRISTOPHER J. REICHMAN	
6	Attorney for Plaintiff	
7	Dated: May 22, 2025 MICHELE BECKWITH	
8	Acting United States Attorney MATHEW W. PILE	
9	Associate General Counsel	
10	Social Security Administration	
11	By: <u>/s/ Lillian J. Lee</u>	
12	LILLIAN J. LEE Special Assistant U.S. Attorney	
13	Attorneys for Defendant	
14		
15		
16	<u>ORDER</u>	
17	Pursuant to the parties' stipulation, IT IS SO ORDERED that Defendant shall have an	
18	extension, up to and including June 20, 2025, to respond to Plaintiff's Motion for Summary	
19	Judgment.	
20	Dated: May 27, 2025 Carop U. Delany	
21	CAROLYN K. DELANEY	
22	UNITED STATES MAGISTRATE JUDGE	
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25		
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27		
28		